

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:)	Chapter 11
)	
)	Case No. 08-35653-KRH
CIRCUIT CITY STORES, INC., et. al.)	Jointly Administered
)	
Debtors.)	

**MOTION PURSUANT TO LOCAL BANKRUPTCY
RULE 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

COMES NOW Jennifer McLain McLemore (“Movant”) of Christian & Barton LLP, a member in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and hereby moves the Court pursuant to this Motion (the “Motion”) for the entry of an Order substantially in the form of Exhibit A authorizing David Mark Bennett (“Mr. Bennett”), a lawyer whose address is 1722 Routh Street, Suite 1500, Dallas, Texas 75201, to appear and practice *pro hac vice* on behalf of LaSalle/Wells Fargo/Midland Creditors,¹ named Defendants

¹ (1) LaSalle Bank National Association, f/k/a LaSalle National Bank, as Trustee of Corporate Credit-Backed Pass-Through Certificates, Series 1997-CTL-1, acting by and through Midland Loan Services, a division of PNC Bank, National Association, in its authorized capacity as special servicer pursuant to that certain Pooling and Servicing Agreement dated as of January 15, 1997; (2) Wells Fargo Bank, N.A., as Trustee for Nationslink Funding Corporation Commercial Loan Pass-Through Certificates, Series 1999-LTL-1, acting by and through Midland Loan Services, a division of PNC Bank, national Association, in its authorized capacity as special servicer pursuant to the applicable Pooling and Servicing Agreement; (3) LaSalle Bank National Association, f/k/a LaSalle National Bank, as Trustee of Corporate Credit-Backed Pass-Through Certificates, Series 1997-CTL-1, acting by and through Midland Loan Servicers, a division of PNC Bank, National Association, in its authorized capacity as special servicer pursuant to the Applicable Pooling and Servicing Agreement; (4) LaSalle Bank national Association, as Trustee for Corporate Lease-Backed Certificates, Series 1999-CLF1, acting by and through Midland Loan Services, a division of PNC Bank, National Association, in its authorized capacity as special servicer pursuant to that certain Pooling and Servicing Agreement Dated as of August 15, 1999; and (5) LaSalle Bank National Association, a nationally chartered bank, as Trustee for Corporate Lease-Backed Certificates, Series 1999-CLF1, acting by and through Midland Loan Services, a division of PNC Bank, National Association, in its authorized Capacity as special servicer pursuant to that certain Pooling and Servicing Agreement dated as of July 15, 1999 (the “LaSalle/WellsFargo/Midland Creditors”)

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Counsel for LaSalle/Wells Fargo/Midland Creditors

in the above-captioned matter now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related litigation or proceedings pursuant to LBR 2090-1(E)(2). In support of this Motion, the Movant states as follows:

1. Mr. Bennett is admitted, practicing and in good standing as a member of the bar of the State of Texas. He is admitted to practice before the United States District Courts for the Eastern District of Texas, Northern District of Texas, Southern District of Texas and the Western District of Texas. Mr. Bennett is also admitted in the U.S. Court of Appeals for the Fifth and Tenth Circuits.

2. Pursuant to LBR 2090-1(E)(2), “an attorney from another State . . . may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar.”

3. Movant requests the Court to allow Mr. Bennett to file pleadings and to appear at hearings in these Chapter 11 cases.

4. Notice of this Motion has been given to the Plaintiff. In light of the nature of the relief requested, Movant respectfully submits that no further notice is required.

5. An Application pursuant to LBR2090-1(E)(2)(a) is appended to this Motion.

WHEREFORE, the Movant respectfully requests that the Court enter an Order substantially in the form attached as Exhibit A (a) authorizing Mr. Bennett to appear and practice *pro hac vice* on behalf of the LaSalle/Wells Fargo/Midland Creditors and (b) granting such other and further relief as is just and proper.

Dated: June 7, 2011

Respectfully submitted,

/s/ Jennifer M. McLemore
Jennifer M. McLemore

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Counsel to for LaSalle/Wells Fargo/Midland Creditors

CERTIFICATE OF SERVICE

I, Jennifer M. McLemore, hereby certify that on the 7th day of June, 2011, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of David Mark Bennett was served on all persons receiving electronic notices in this case.

/s/ Jennifer M. McLemore
Jennifer M. McLemore

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653, * Case Name In re Circuit City Stores, Inc., et al.

PERSONAL STATEMENT

FULL NAME (no initials, please) David Mark Bennett
Bar Identification Number 02139600 State Texas
Firm Name Thompson & Knight LLP
Firm Phone # (214) 969-1700 Direct Dial # (214) 969-1486 FAX # (214) 969-1751
E-Mail Address David.Bennett@tklaw.com
Office Mailing Address 1722 Routh Street, Suite 1500, Dallas, Texas 75201
Name(s) of federal court(s) in which I have been admitted ED of TX, ND of TX, SD of TX, WD of TX and US Court of Appeals for the Fifth and Tenth Circuits

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.


(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.


(Signature) June 6, 2011
(Date)

Jennifer M. McLemore (VSB No. 47164)
(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

Court Use Only:

The motion for admission is GRANTED _____ or DENIED _____

(Judge's Signature) (Date)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:)	Chapter 11
)	
)	Case No. 08-35653-KRH
CIRCUIT CITY STORES, INC., et. al.)	Jointly Administered
)	
Debtors.)	

**ORDER GRANTING MOTION PURSUANT TO
LBR 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

Upon the Motion (the “Motion”) of Jennifer McLain McLemore, for the admission *pro hac vice* of David Mark Bennett (“Mr. Bennett”), a lawyer whose address is 1722 Routh Street, Suite 1500, Dallas, Texas 75201, to appear and practice *pro hac vice* on behalf of LaSalle/Wells Fargo/Midland Creditors,¹ appearing that the relief requested is in the best interests of the Debtors’ estates, their creditors and other parties in interest; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and

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Counsel for LaSalle/Wells Fargo/Midland Creditors

1409; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED:

1. The Motion is GRANTED.
2. Mr. Bennett is authorized to appear and practice *pro hac vice* as counsel to LaSalle/Wells Fargo/Midland Creditors, in the above-captioned matter.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

ENTERED: _____

United States Bankruptcy Court Judge

I ask for this:

/s/ Jennifer McLemore
Augustus C. Epps, Jr., Esquire (VSB No. 13254)
Michael D. Mueller, Esquire (VSB No. 38216)
Jennifer M. McLemore, Esquire (VSB No. 47164)
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LOCAL BANKRUPTCY RULE 9022-1 CERTIFICATE

I hereby certify that the foregoing Order has been endorsed by all necessary parties.

/s/ Jennifer M. McLemore
Jennifer M. McLemore